

IN THE UNITED STATES DISTRICT COURT
STATE OF SOUTH CAROLINA
COLUMBIA DIVISION

Katherine Bradacs and Tracie)	
Goodwin,)	C/A No. 3:13-cv-02351-JMC
)	
Plaintiffs,)	
)	
vs.)	
)	
Nimrata (“Nikki”) Randhawa Haley, in)	CONSENT MOTION TO EXTEND
her official capacity as Governor of)	DEADLINE TO FILE PETITION FOR
South Carolina; Alan M. Wilson, in his)	ATTORNEY’S FEE AND COSTS AND
official capacity as Attorney General,)	RESPONSE THERETO
)	
Defendants.)	
_____)	

Plaintiffs Katherine Bradacs and Tracie Goodwin, by and through their attorneys, and with the consent of the Defendants, by and through their attorneys, hereby file this Consent Motion to extend Plaintiffs’ deadline to file a petition for attorney’s fees and costs and any defense response thereto. The current deadline for said petition is December 2, 2014. For the reasons set forth below, the Plaintiffs respectfully request that the Court extend the deadline by 14 days and afford Defendants a corresponding period of time in which to respond to the petition therefore making Plaintiffs’ deadline December 16, 2014, and Defendants’ deadline January 13, 2015. In support thereof, the Parties state as follows:

1. The Court granted summary judgment to Plaintiffs on November 18, 2014.
2. Since this Court’s order, counsel for the Plaintiffs had substantial deadlines and increased workload leading up to the Thanksgiving holidays. This included

preparation of a communication to the South Carolina Office of Disciplinary Counsel on behalf of an attorney/client, preparation of several appellate briefs before the Supreme Court of South Carolina and the South Carolina Court of Appeals, and attending to a medical emergency involving a family member.

3. The extension will not affect other deadlines or unduly prejudice either Party.

Wherefore, the Parties respectfully request the Court extend Plaintiffs' deadline to file a petition for attorney's fees and costs from December 2, 2014, making the Plaintiff's deadline to file the petition December 16, 2014 and the Defendant's deadline to file a response January 13, 2015. The Parties respectfully reserve the right to request additional time to prepare a fee application or return to request that filings be deferred.

WE SO MOVE:

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WE SO CONSENT:

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October 31, 2014
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ATTORNEYS FOR DEFENDANTS
GOVERNOR AND ATTORNEY GENERAL